

REMARKS

Applicants appreciate the consideration of the present application afforded by the Examiner. Claims 1-11 and 13-25 were pending prior to the Office Action. Claims 1-10 have been canceled and claims 26-30 have been added through this Reply. Therefore, claims 11 and 13-30 are pending. Claims 11 and 21 are independent. Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks.

Interview Summary

Applicants appreciate the time afforded by the Examiner in conducting the interview on January 2, 2008. During the interview, Applicants' counsel discussed the deficiencies of the prior art references with the Examiner, specifically with respect to the segmentation module and the conversion module. No specific agreement was reached, although the Examiner indicated that he would consider Applicants' arguments and amendments against the applied art upon the filing of a formal Reply.

Claim Rejections - 35 U.S.C. §101

Claims 1-11 and 13-25 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Claims 1-10 have been canceled, thus rendering the rejection of those claims moot. Claims 11 and 13-20 have been amended to recite a computer-readable medium storing a computer program, which the Office recognizes as statutory subject matter under § 101. Applicants respectfully request the § 101 rejection of claims 11 and 13-20 be withdrawn.

Applicants respectfully traverse the § 101 rejection of claims 21-25. Claims 21-25 recite a method, which falls under the statutory classes of claim construction set forth in § 101. Applicants submit that claims 21-25 recite statutory subject matter and respectfully request that the §101 rejection of claim 21-25 be withdrawn.

Claim Rejections - 35 U.S.C. §103(a)

Claims 1-11, and 13-25 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent Publication No. 2003/0197736 to Murphy ("Murphy") in view of U.S. Patent No. 6,311,323 to Shulman et al. ("Shulman").

Claims 1-10 have been canceled, rendering the rejection of these claims moot. As applied to the remaining claims, Applicants submit the Examiner has failed to establish a *prima facie* case of obviousness and traverse the rejection.

For a 35 U.S.C. § 103 rejection to be proper, a *prima facie* case of obviousness must be established. *See M.P.E.P. 2142*. One requirement to establish *prima facie* case of obviousness is that the prior art references, when combined, must teach or suggest all claim limitations. *See M.P.E.P. 2142; M.P.E.P. 706.02(j)*. Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

Independent **claim 11** recites a computer-readable medium having stored thereon a computer program for converting characters of a first type into at least one character of a second type, said program when executed enables, *inter alia*, a user interface which provides an indicator indicating which of the plurality of characters of the first type are to be associated together into a segment; and enables a user to manipulate the indicator to designate two or more of the displayed characters of the first type to be associated into the segment; a segmentation module that associates the characters into the segment based on the designation by the user via the user interface; and a character conversion module that converts the characters of the segment into at least one character of the second type.

Murphy is directed to a user interface for character entry wherein limited numbers of alphanumeric characters and symbols are displayed on the screen at a given time. These individual characters are arranged as a plurality of character selection segments 44 arranged in certain groups (see Figs. 3A-3F; ¶ 39). During character entry, the user selects a particular character by touching the segment containing the desired character. The user can change which set of characters is being displayed by pressing certain hard or soft keys (see ¶ 40) and the character sets may automatically place frequently used characters in proximity to each other (see ¶ 54).

In contrast, the present invention is directed to a user interface whereby a plurality of characters of a first type are displayed. An indicator is provided and is manipulatable by the user to designate two or more of the displayed characters. These designated characters are associated into a segment by a segmentation module. A character conversion module converts the characters of the segment into at least one character of a second type.

Applicants submit that Murphy does not teach or suggest a user interface providing an indicator and enabling a user to manipulate said indicator to designate two or more of the characters together in a segment as claimed. Applicants note that, as used in the instant application, the term “segment” refers to “a group of characters that are to be converted or translated as a single unit into an alternate group of characters.” *See Specification, ¶ 11*. Although Murphy mentions character selection “segments,” this merely refers to the areas of the circular character entry interface 40 (*see Fig. 1*) which a user selects in order to input text. Each segment only has one character. Furthermore, and as conceded by the Examiner (*see Office Action, p. 3, lines 16-17*), Murphy does not disclose providing an indicator in the user interface indicating which of the characters are to be associated in a segment. Importantly, Murphy is used solely as a means for text entry and does not teach or suggest character conversion in any form.

The Examiner relies upon the Schulman reference to cure the deficiencies of Murphy. Shulman is directed to a computer programming language statement building tool which assists a programmer during the writing of a computer program by generating, in real time, assist menus based on the code currently being entered. These assist menus provide the programmer with options for completing coding statements which are currently being entered. *See col. 4, lines 19-67*. When the programmer begins a certain code statement, an assist menu is provided listing the possible statements the programmer may be attempting to write. The programmer may then choose from the list to automatically complete the statement. *See col. 7, lines 12-39*.

First, Applicants note that Schulman is directed to a programming-assist means for completing programming statements and respectfully submit that Shulman fails to teach an indicator manipulated by the user to designate a segment of characters. The Examiner relies upon Shulman, col. 7, lines 40-61 to allegedly teach this feature. However, this citation of Shulman

only makes reference to an “indicator bar” which highlights a desired menu item in the assist menu. However, Applicants submit that this highlighting bar is not designed to designate characters for association into a “segment,” especially in light of the definition of such a segment proffered by the instant specification, and instead merely indicates which menu item the user is intending to select for text auto-completion. Furthermore, Shulman fails to teach or suggest a segmentation module as claimed, or a character conversion module that converts the characters of the segment into at least one character of a second type. Accordingly, neither Murphy nor Shulman, alone or in combination, teach or suggest all of the features of independent claim 11.

In this instance, the combination of Murphy and Shulman fails to teach or suggest each and every limitation of claim 11. As demonstrated above, Murphy and Shulman both fail to teach or suggest, *inter alia*, “an indicator indicating which of the plurality of characters of the first type are to be associated together into a segment; and enables a user to manipulate the indicator to designate two or more of the displayed characters of the first type to be associated into the segment,” and “a character conversion module that converts the characters of the segment into at least one character of the second type” as recited in claim 1. Dependent claims 13-20 are also distinguishable from the prior art at least due to their dependence from claim 11, directly or indirectly.

Therefore, Applicants submit that claims 11 and 13-20 are patentable over Murphy in view of Shulman and respectfully request that the rejection of the claims under §103(a) be withdrawn.

Independent **claim 21** recites a method comprising, *inter alia*, providing, in the user interface, an indicator capable of being manipulated by the user to indicate a first group of the plurality of characters of a first type to be associated into a segment; and converting the characters of the segment into at least one character of a second type.

For at least the reasons presented above with respect to independent claim 1, Applicants submit that claim 21 is distinguishable from the teachings of Murphy and Shulman, alone or in combination. Dependent claims 22-25 are also distinguishable from the prior art at least due to their dependence from claim 21, directly or indirectly.

Therefore, Applicants submit that claims 21-25 are patentable over the applied prior art and respectfully request that the rejection of these claims under §103(a) be withdrawn.

New Claims

New claims 26-30 have been added through this Amendment, and are considered to be in condition for allowance at least due to their dependence upon allowable claims 11 and 21. No new matter has been entered.

CONCLUSION

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Notice of same is earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John R. Sanders Reg. No. 60,166 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

Application No. 10/705,718
Amendment dated January 25, 2008
Reply to Office Action of July 25, 2007

Docket No.: 5486-0236PUS1

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

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